

Jan. 22

The computer was
having some difficulties
with emailing this,
so it's being sent thru
the mail as well.

Steve Praciak

Cherry Point Coal Terminal Project

I am Steve Racich, a recently retired Industrial Hygienist after 24 plus years with the Environmental Health and Safety department at Western Washington University. My many work tasks included reviewing public works project safety and health plans from the bid-awarded contractors. One of my main tasks was to scrutinize the various hazardous material consultants, contractors, and review their submittals. I responded to noise level, air quality, legal/regulatory compliance, and safety issues throughout the entire campus that included the Physical Plant, Faculty, Student, and Public. I am a life time alumni member of WWU with a degree in Political Science. I also worked in the craft trades at the refineries, including Cherry Point, for over 10 years prior to working at WWU. I was a resident in the Longview WA. area for several years, working at the Longview Paper Mill and on a track crew for a short time. As a resident of Bellingham since 1969 and living in the south hill neighborhood for over 35 years, I am very concerned with the impact that this proposed terminal will have here and worldwide.

The negative impact that this terminal will have is staggering and unacceptable. You will hear from me in the future with opinions that includes supporting evidence.

- Noise levels:
 - The biggest aggravation I have is being awoken up nightly with train horns that are required to follow the Federal Railroad Administration regulatory guidelines with the June 24, 2005 rule for horn protocol that includes a minimum of 110 decibels. I belong to an early exercise group who can state the times we are all awoken during the night. NO, we did not experience this noise prior to the now existing coal train traffic. No other place in the world allows this horn noise; this is louder than an emergency vehicle siren. I will comment much more on this at a later date since the railroads have no public accountability. Of course SSA Marine will defer this to Burlington Northern.
 - There must be an analysis of the traffic over Bellingham's crossings in the middle of the night. Lack of sleep has many health issues, the next step may be litigation.
 - A vibration and geological study of the track surfaces and resulting slides caused by the trains.
- Whatcom Docs Position Statements and Appendices:
 - This must be accepted in its entirety since it is factual and measurable. For example, diesel emission rules go into effect now and 4,000 horsepower train locomotives that numbers 3-5 in each passing emit large amounts of diesel

particulates. Large ships contribute large amounts to diesel emissions since they run with bunker fuel.

- Standards:

- What standards are we going to follow? There are more than 60 environmental and health standards. For example; the American Industrial Hygienists are in many instances lower in permissible exposure levels than the Occupational Health and Safety Administration standards. My experience has found one can hire environment firms to get the results you want. Very important: *truly representative sampling*. Instrumentation is only as good as its calibration and must be used by those trained in proper use. The hazardous testing consultant must have a quality control protocol and should be third party; not one hired by the contractor, simply a conflict of interest.

- Politics:

- I could go on forever, you will hear from me later as time allows. First of all, there is no such thing as clean coal, it is the dirtiest fossil fuel in the world. The proponents speak of clean coal technology of which their hired public relations (PR) firms would lead one to believe that there are really few or no adverse effects of clean coal operations. The PR people should be held to the standards of the drug makers in stating side effects that coal may have.
- Jobs: I have visited Newcastle, Australia 3 times, as recent as March, 2012. *NO* it is not a tourist destination that some would want you to believe, it is mostly the nearby communities, like Port Stephens, that tourists visit. Many Newcastle residents told me that the coal company PR people promised them the many jobs etc., however the operation is highly computer mechanized, and the employee parking lot is the smallest part of the operation. The two major terminals plan on extensive expansions as well.
- If the county mayors want the coal terminals that badly, then utilize the highway 9 county railroad lines since it would only effect a few thousand that seem to want the project and perhaps a few cows. Why should 82,000 Bellingham residents be subjected to the ill effects?
- Petitions that were submitted by proponents should not be part of any record since the other petition was not accepted.
- Remember *WHOOPS*, the nuclear project in the early 1980s south of here at Satsop that became more than a 2 billion dollar fiasco; look up the history of this project and note the similarities. The coal companies are in trouble since the price of natural gas are fueling many of the electrical generation plants now and

they need another market. I believe this will eventually become another
WHOOPS!

- Questions and more concerns:

- Where do you think all the steel that this project requires will come from? Our hypocritical unions and politicians say buy American, it will produce jobs.
- SSA Marine is honest? SSA Marine states that they embrace environmental excellence in everything they do, yet they cannot. Their first response was denial of any wrong-doing from the moment they arrived on site. Initial non-permitting ought to have disqualified them from the beginning. It is only because they got caught that they have stated that they will now work within the regulatory framework of our community and embrace environmental excellence in everything they do, as stated in their brochure.
- Tax revenue? Minuscule when it only would take a fraction of a percent of the Chuckanut, Edgemoor, and Southhill property values to lose value exceeding the tax revenue promised after construction. I know many Realtors that are upset that their board is a proponent, and now have to rationalize the high prices in view properties and living with the noise.
- Peabody Coal? Newsweek published the worst polluters of 2012; guess who was the "worst of the worst". Their promised land-reclamation is less than 5%. They use surfactant spray on their open rail cars; yet state that most of the coal lost is in the first 100 miles. Prove to me that this "elmer's glue solution" lasts throughout the 1200 mile journey.

- In summary:

I have reduced this comment outline substantially; I could rant on for many more pages. You will hear much more from me in the future. Many people have contacted me to review this proposed project because of my industrial hygiene expertise and work experience. Unfortunately because of time restraints I have waited until the last minute to respond, so the polish is not present. The site marine degradation alone should disqualify this site for a coal shipping terminal. Then there is the issue of climate change/air pollution that we will be a party to. SSA Marine/Peabody Coal is spending many dollars promoting this project, lobbying politicians, union officials, and promising unattainable results. Look for more of the same from this group using mister and misses congeniality to tell us they are our friend and our community quality of life will be better. The fact is that "corporations are people and money is speech." Get ready for another "*WHOOPS*". **Question is: "what part of NO do they not understand?"**


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